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March 1, 2022

Electronically filed in TPUC Docket Room
on March 1, 2022 at 2:03 p.m.

Via Email and U.S. Mail

Executive Director Earl Taylor
c/o Ectory Lawless
Tennessee Public Utility Commission
502 Deaderick Street, Fourth Floor
Nashville, Tennessee 37243

Re: Docket No. 20-00086

Dear Mr. Taylor:

On March 1, 2022, Piedmont Natural Gas Company, Inc. ("Piedmont") inadvertently filed an incorrect version of its Motion for Approval of Rate Case Expense Rider Rates ("Motion"). Please find the attached correct version of the Motion. Please disregard our prior Motion and accept the attached corrected Motion in its place

This material is also being filed today by way of email to the Commission docket manager, Ectory Lawless. Please file the original and provide a "filed" stamped copy of the same via my assistant's email, at denise.guye@wallerlaw.com.

Very truly yours,

Paul S. Davidson

Enclosure

cc: Consumer Advocate
Bruce Barkley
Pia Powers
James H. Jeffries IV

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE**

IN RE:)	
)	
PIEDMONT NATURAL GAS COMPANY, INC.)	
PETITION FOR AN ADJUSTMENT OF RATES,)	DOCKET NO. 20-00086
CHARGES, AND TARIFFS APPLICABLE TO)	
SERVICE IN TENNESSEE)	
)	

MOTION FOR APPROVAL OF RATE CASE EXPENSE RIDER RATES

Piedmont Natural Gas Company, Inc. (“Piedmont” or “Company”), through counsel and consistent with the provisions of the approved Stipulation and Settlement Agreement (“Settlement”) in this docket, respectfully moves the Commission for approval of the rate case expense rider rates identified and discussed in the Supporting Testimony and Exhibits of Quynh P. Bowman filed concurrently with this Motion. In support of this Motion, Piedmont respectfully shows unto the Commission as follows:

1. On February 3, 2021, Piedmont and the Consumer Advocate Unit in the Financial Division of the Attorney General’s Office (“Consumer Advocate”) filed the Settlement resolving all disputed issues in this proceeding as between the Company and the Consumer Advocate.

2. On May 6, 2021, the Tennessee Public Utility Commission (“Commission” or the “TPUC”) approved the Settlement.

3. The Settlement provides for recovery of rate case expense through a rider mechanism and Paragraph No. 17.f. of the Settlement specifically provides:

Rate Case expense shall be limited to no more than \$900,000 in actual rate case costs and shall be amortized over a three (3) year period and collected through a separate rider mechanism. The rates of such rider mechanism shall be approved by the Commission upon the filing of invoices supporting such expense and the audit and approval thereof. At the conclusion of the three year rider period, any amount that is over collected or

under collected under this rider shall be refunded to or collected from customers by transferring such overcollection or under collection to Piedmont's Actual Cost Adjustment account.

4. Piedmont has concluded its accounting of rate case expenses in this proceeding. These expenses are comprised of outside consulting and expert witness services, legal expense incurred in the preparation and prosecution of the case, and other administrative expenses, the invoices for which are detailed in the Supplemental Testimony and Exhibits of Quynh P. Bowman filed herewith. A copy of each invoice comprising the Company's rate case expense is provided in CONFIDENTIAL Exhibit_(QPB-3).

5. Consistent with Paragraph No. 17.f. of the Settlement, Piedmont respectfully requests Commission authorization to implement rider rates designed to collect Piedmont's rate case expenses, in the amount of \$660,575, amortized over a three-year period, all as is also explained in the Supplemental Testimony and Exhibits of Quynh P. Bowman filed herewith.

WHEREFORE, Piedmont Natural Gas Company, Inc., respectfully requests that the Commission approve Piedmont's proposed rate case expense rider rates, effective for bills rendered after April 1, 2022, or the first of the month following the completion of the Commission's review.

Respectfully submitted this 1st day of March, 2022.

Piedmont Natural Gas Company, Inc.

By: /s/ Paul S. Davidson
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